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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA,

Case No. 6-16-CV-00053-MA

Plaintiff,

v.

**COMPLAINT, *in rem*,
FOR FORFEITURE**

85 ASSORTED FIREARMS, *in rem*,
(FURTHER DESCRIBED IN EXHIBIT 1,
ATTACHED)

Defendants.

Plaintiff, United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and Amy E. Potter, Assistant United States Attorney, for its complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 18 U.S.C. §§ 922 and 924; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

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II.

Defendants, *in rem*, 85 Assorted Firearms, further described in Exhibit 1 attached to this Complaint, are now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendants, *in rem*, 85 Assorted Firearms, were used or intended to be used in any manner or part to commit or to facilitate in the commission of a violation of 18 U.S.C. §§ 922(b)(5), 922(d)(1), 922(m), and 922(t), and are forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 924(d), as more particularly set forth in the declaration of Caleb Enk, Special Agent Bureau of Alcohol, Tobacco, Firearms, and Explosives, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendants, *in rem*, 85 Assorted Firearms; that due notice be given to all interested persons to appear and show cause why forfeiture of these defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this action, and that plaintiff have such other and further relief as is just and equitable.

Respectfully submitted this 13th day of January 2016.

BILLY J. WILLIAMS
United States Attorney
s/ Amy E. Potter
AMY E. POTTER
Assistant United States Attorney

VERIFICATION

I, CALEB ENK declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Caleb Enk

CALEB ENK

Special Agent

Bureau of Alcohol, Tobacco, Firearms, and Explosives